

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
KATHERINE TANAKA
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
702-388-6577 Phone
5 Katherine_Tanaka@fd.org

6 Attorney for Cynthia Ann Morgan

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 CYNTHIA ANN MORGAN

13 Defendant.
14

Case No: 2:18-mj-0503-EJY

**STIPULATION TO VACATE
STATUS HEARING
AND CLOSE CASE**

15 IT IS HEREBY STIPULATED AND AGREED, by and between United States
16 Attorney Nicholas A. Trutanich and Special Assistant United States Attorney Rachel L. Kent,
17 counsel for the United States of America, and Federal Public Defender Rene L. Valladares
18 and Assistant Federal Defender Katherine Tanaka, counsel for Cynthia Ann Morgan that the
19 status hearing previously scheduled for June 16, 2020 at 1:30 p.m. be vacated and the case
20 closed.

21 This Stipulation is entered into for the following reasons:

22 1. Defendant was charged Operating a motor vehicle under the influence of
23 alcohol in violation of 36 C.F.R. § 4.23(a)(1); Operating a motor vehicle with a BAC of 0.08
24 grams and higher in violation of 36 C.F.R. § 4.23(a)(2); Driving without a valid license in
25 violation of 36 C.F.R. § 4.2(b) and NRS 483.550(1); and Interfering with agency functions in
26 violations of 36 C.F.R. § 2.23(a)(1).

1 2. On June 14, 2018, Defendant pleaded guilty to operating a motor vehicle under
2 the influence of alcohol in violation of 36 C.F.R. § 4.23(a)(1) and was sentenced to one year
3 of unsupervised probation with the following conditions requiring Ms. Morgan (1) to
4 complete a DUI and VIP course; (2) not to violate any local, state, or federal laws; and (3) not
5 to enter the Lake Mead National Recreation Area for a period of (12) twelve months. The
6 remaining charges were dismissed.

7 3. Defendant has successfully completed the conditions. Defendant has
8 completed a DUI and VIP course and has reported she has not violated any local, state, or
9 federal laws and that she did not enter the Lake Mead National Recreation from June 2018 to
10 June 2019.

11 4. The Government is satisfied Defendant has completed the conditions of her
12 sentencing.

13 5. Because Defendant has successfully completed the terms of her sentencing, the
14 parties request the Court vacate the status hearing and ask that the case be closed.

15 DATE: June 15, 2020

16
17 RENE L. VALLADARES
18 Federal Public Defender

19 By /s/ Katherine Tanaka

20 KATHERINE TANAKA
21 Assistant Federal Public Defender

22 NICHOLAS A. TRUTANICH
23 United States Attorney

24 By /s/ Rachel L. Kent

25 RACHEL L. KENT
26 Special Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CYNTHIA ANN MORGAN

Defendant.

Case No. 2:18-mj-0503-EJY

~~PROPOSED~~ ORDER

ORDER

Based on the pending Stipulation of counsel, the Court finds Defendant has successfully completed the conditions of her sentencing.

IT IS THEREFORE ORDERED that the status hearing scheduled for June 16, 2020, at 1:30 p.m. is vacated and the case is closed.

DATED this 16th day of June, 2020.


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on June 15, 2020 she served an electronic copy of the above and foregoing **STIPULATION TO VACATE STATUS CHECK HEARING AND CLOSE CASE** by emailing to:

NICHOLAS A. TRUTANICH
United States Attorney
Rachel L. Kent
Special Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Felicia Darensbourg
Employee of the Federal Public Defender